REMARKS

The indicated allowability of claims 21-23, 27-28, 31-32 and 35-37 is gratefully acknowledged.

The term "means for routing" has been replaced by "a controller for routing" throughout the claims. The term "routing means" has been replaced by "routing controller" throughout the claims. For support, see, for example, page 9, lines 13-14 of the specification, which indicates that the "matrix-controller unit" includes means for routing. In claim 25, the word "inks" has been replaced by "links", as suggested by the Examiner. In claim 30, the word "adapted" has been replaced by "arranged".

In the accompanying drawings, descriptive labels have been provided in Figures 1-6 & 9-11, as required.

On the merits, the Examiner contends that the subject matter of the independent claims 20, 33 & 34 is anticipated by U.S. Publication No. 2003/0058848 to Dally, with the Examiner drawing attention to Figure 4B and paragraphs [0023] and [0025]. Applicant respectfully refutes this contention, because Dally does *not* disclose the subject matter indicated by the Examiner. It is submitted that the Examiner may have mistakenly interpreted the teachings of Dally, perhaps due to the confusing manner in which Dally is written.

Upon reconsideration, the Examiner will note that Dally does *not* disclose a switching network for switching frames of data in defined time-slots, the switching network comprising applicant's claimed input stage, intermediate stage and output stage, and applicant's claimed controller for routing each time-slot of each frame independently through the switching matrices.

In particular, in Figure 4A, Dally shows a T-S-T (time-space-time) digital cross connect (see paragraph [0009]). By way of contrast, Figure 4B shows an equivalent three-stage S-S-S (space-space-space) Clos network consisting of three stages, all of which are cross point space switches. It will be noted that only Figure 4A shows, as an input to the Time Slot Interchanger (TSI), input time slots (labelled A, B, C, D, E, F, G, H).

By way of contrast, it will be seen that in Figure 4B, the input to the three-stage S-S-S Clos network comprises eight ports, each port being labelled with the data it is carrying (i.e., the first port receives data A, the second port receives data B, the third port receives data C, etc.).

It will be noted that, at no stage, does Dally refer to the input of the Clos network shown in Figure 4B as being a "time slot". The input to the T-S-T network will be in time-slots, but the input to the S-S-S network will be separate data on separate ports. Dally simply teaches that a space switching architecture as illustrated in Figure 4B, or a time-space-time network can be used as in Figure 4A, for switching of the appropriate data types. For example, see paragraph [0019] which states that "the network may be a time-space-time network or a space-space-space network".

Dally teaches a method of scheduling calls on a three-stage network. As noted in paragraph [0051], the scheduling problem is to assign each connection to a middle stage switch of Figure 4B, or to a time slot in Figure 4A so that all connections are assigned, etc. In other words, Dally here explicitly considers the different S-S-S and T-S-T architecture shown in Figures 4A & 4B separately. The time slots are relevant to the architecture shown in Figure 4A, and the middle stage switch is relevant to the architecture shown in Figure 4B.

Applicant submits that the terminology used in paragraphs [0023] and [0025] is misleading, because it intermingles the concepts of stages and time slots. However, as noted in

paragraph [0019], that is because the network may be a time-space-time network or a space-space-space network, i.e., the concept of time-slots applies *only* to the T-S-T network, and the concept of stages applies *only* to the S-S-S network.

At no point does Dally describe the network shown in Figure 4B as being suitable for routing time-slots independently through the switching matrices. The terminology of time-slots is only used with reference to the type of architecture shown in Figure 4A, which Dally admits is a completely separate type of architecture.

Thus, it is respectfully submitted that Dally does not disclose, or even hint at, a switching network for switching frames of data in defined time-slots, comprising the claimed input stage, intermediate stage and output stage, and the claimed controller for routing each time-slot of each frame independently through the switching matrices.

Consequently, it is respectfully submitted that the subject matter of independent claims 20, 33 and 34 (and hence all claims dependent thereon) is both novel and inventive over the cited prior art. Allowance of all claims, as amended, is respectfully requested.

In keeping with the duty of candor, applicant has become aware of Chinese Patent Application CN1159723A. Accompanying this communication is an information disclosure statement disclosing the existence of U.S. Patent No. 5,754,120, which is the English language equivalent of Chinese Patent Application CN1159723A. The Commissioner is authorized to charge Deposit Account No. 11-1145 for the Rule 17(p) fee of $180.00.

Petition is hereby made for a one-month extension of the period to respond to the outstanding Official Action to June 19, 2009. The Commissioner is authorized to charge $130.00,

as the Petition fee, any additional charges, or any overpayment, in connection with the filing of this

response, or any such deficiency, or credit any such overpayment, to Deposit Account No. 11-1145.

Wherefore, a favorable action is earnestly solicited.

Respectfully submitted,

KIRSCHSTEIN, ISRAEL, SCHIFFMILLER & PIERONI, P.C.
Attorneys for Applicant(s)
425 Fifth Avenue, 5th Floor
New York, New York 10016-2223
Tel: (212) 697-3750
Fax: (212) 949-1690

/Alan ISRAEL/

_____

Alan Israel
Reg. No. 27,564